



D. Craig Martin
E-Mail: cmartin@wideopenwest.com

Direct Dial: 269-567-4200

February 24, 2009

Via ECFS

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: **EB Docket No. 06-36;**
WideOpenWest Ohio, LLC
499 Filer ID: 825952

Dear Ms. Dortch:

We enclose for filing WideOpenWest Ohio, LLC's Annual CPNI Certification. This Certification is being filed in compliance with 47 C.F.R. § 64.2009(e).

If you have any questions, please feel free to call me. Thank you.

Very truly yours,

WOW! Internet, Cable and Phone

/s/

D. Craig Martin
General Counsel

cc: Best Copy and Printing, Inc. (via e-mail)
Enforcement Bureau, Telecommunications Consumers Division (two copies, via First Class Mail)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 24, 2009

Name of company covered by this certification: WideOpenWest Ohio, LLC

Form 499 Filer ID: 825952

Name of signatory: D. Craig Martin

Title of signatory: Secretary and General Counsel

I, D. Craig Martin, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Because the company is not aware of any activity by data brokers or pretexters with respect to its customers' CPNI during the reporting year, the company has no information to report with respect to the processes pretexters are using to attempt to access CPNI. The company's steps taken to protect CPNI are described in the accompany statement.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed: /s/ [electronic signature]
By: D. Craig Martin
Its: Secretary and General Counsel

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

CPNI COMPLIANCE PROCEDURES STATEMENT

WideOpenWest Ohio, LLC; Form 499 Filer ID: 825952

WideOpenWest Ohio, LLC (“WOW”) has established the following policies and operating procedures to comply with the Commission’s rules governing Customer Proprietary Network Information (“CPNI”), 47 C.F.R. § 64.2001 *et seq.*

1. WOW has established policies that expressly prohibit release of CPNI to any employee not directly involved in the provision of service to the customer. CPNI data is accessible only to those employees with a “need to know” for purposes of serving current subscribers.
2. WOW currently does not use CPNI for any purpose for which customer opt-out or opt-in approval is required under the Commission’s rules. WOW does obtain customer opt-out approval (as described below) so that it may in the future use and disclose a customer’s CPNI for the limited purpose of marketing communications-related services to that customer. The customer’s approval or disapproval to use, disclose, or permit access to a customer’s CPNI obtained by WOW remains in effect until the customer revokes or limits such approval or disapproval. Records of customers’ CPNI approvals are kept for at least one year.
3. Prior to soliciting the customer’s opt-out approval for use of CPNI, WOW provides written notification of the customer’s right to restrict use of, disclosure of, and access to that customer’s CPNI. The content of such notification complies with the Commission’s rules. WOW keeps records of notification for at least one year. Opt-out notices are provided to customers at least every two years, and customers are given a minimum of 30-days to opt-out before they are presumed to have consented to use of their CPNI.
4. WOW has a system in place by which the status of a customer’s CPNI approval can be clearly established prior to the use of CPNI. WOW keeps an electronic record of each customer that has objected to our use of their CPNI, which record is reflected on the customer’s account. These CPNI approval records are consulted prior to any use or disclosure of CPNI for any marketing purpose.
5. Employees receive CPNI protection training as to when employees are and are not authorized to use CPNI. WOW has an express disciplinary process in place, which includes termination of employment for violation of the CPNI protection requirements.
6. WOW’s policy is to maintain a record, electronically or in some other manner, of any sales and marketing campaigns that use its customers’ CPNI. Such records are maintained for all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI, and will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. WOW will retain the record for a minimum of one year.
7. WOW has established a supervisory review process regarding carrier compliance with the CPNI rules for any outbound marketing situations. All sales or marketing campaigns initiated by WOW require approval by the Vice President of Marketing who is responsible for ensuring that each campaign strictly complies with the Commission’s CPNI regulations. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval. WOW will maintain records of carrier compliance for a minimum period of one year.

8. WOW does not provide call detail information to customers over the telephone. If the customer is able to provide call detail information to WOW during a customer-initiated call without our assistance, then WOW will discuss the call detail information provided by the customer. In other instances, we will mail call detail records to the address of record.
9. Customers can obtain access to CPNI online only after the customer is authenticated without the use of readily available biographical information or account information. Once authenticated, the customer may only obtain online access to CPNI through a password that is not prompted by asking for readily available biographical information, or account information.
10. WOW notifies customers immediately whenever a password, customer response to a back-up means of authentication for lost or forgotten passwords, online account, or address of record is created or changed. The notice does not reveal the changed information, and is sent to the address of record, not to the new account information.
11. WOW will disclose CPNI to a customer who, at one of our retail locations, first presents to us or our agent a valid photo ID matching the customer's account information.
12. WOW has not experienced any CPNI breaches during the reporting year. However, WOW has in place procedures to detect breaches and to notify law enforcement and customers, in compliance with the Commission's rules, should a breach occur. In the event of a breach, WOW has procedures in place to maintain a record of notifications to law enforcement and customers documenting the date(s) of discovery and notification, a detailed description of the CPNI that was the subject of the breach, and the circumstances of the breach, which record would be kept for a minimum of two years.